

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.

V.

Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448.

MDL No. 3047

Case No.: 4:23-cv-05448-YGR

**STIPULATED REQUEST FOR AND
[PROPOSED] ORDER EXTENDING
THE STATE ATTORNEYS GENERAL'S
TIME TO MOVE TO STRIKE ANY
PORTION OF THE META
DEFENDANTS' ANSWER**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, the State Attorneys General (“State AGs”) and Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC (“Meta”) (collectively, “the Parties”), through their undersigned counsel, hereby stipulate as follows:

1. On November 7, 2024, the Court approved the Parties' stipulation for an extension of time to confer regarding Meta's filing of an amended answer and the State AGs' potential motion to strike certain affirmative defenses pled by Meta in its initial Answer to the State AGs' Complaint. *See* Dkt. No.

1311. The Parties' Stipulation provided that they would file a proposed schedule for the filing of Meta's amended answer and the State AGs' motion to strike by November 20, 2024. *See id.*

2. The Parties have begun and are continuing to meet and confer about the defenses that the State AGs have indicated they intend to move to strike. In light of the number of such defenses, the Parties agree that they would benefit from additional time to continue their conversations before setting a schedule for the filing of Meta’s amended answer and the State AGs’ motion to strike.

3. Consistent with the above, the Parties agree to submit by no later than December 13, 2024 proposed deadlines for the filing of Meta’s amended answer and the State AGs’ motion to strike.

4. The Parties further agree that, in the meantime, an extension to December 20, 2024 of the State AGs' time to file a motion to strike any portion of the Answer would allow adequate time for the Parties to complete this meet-and-confer process.

5. The Parties submit that this proposal is consistent with the timeline of this MDL, which departs from the conventional timeline of the Federal Rules of Civil Procedure due to the complexity of issues involved in this case.

6. The Parties agree that the relief sought herein will not prejudice either Party.

7. The Parties agree that the relief sought herein will not affect the schedule of this case.

8. Therefore, pursuant to Local Rules 6-2 and 7-12, the Parties stipulate and respectfully request that the Court extend the State AGs' deadline to file a motion to strike Meta's Answer (Dkt. No. 125) or any portion thereof under Fed. R. Civ. P. 12(f) up to and including December 20, 2024.

IT IS SO STIPULATED AND AGREED.

DATED: November 20, 2024

Respectfully submitted,

PHILIP J. WEISER
Attorney General
State of Colorado

/s/ *Bianca E. Miyata*
Bianca E. Miyata, CO Reg. No. 42012,
pro hac vice
Senior Assistant Attorney General

1 Lauren M. Dickey, CO Reg. No. 45773,
2 *pro hac vice*
3 First Assistant Attorney General
4 Megan Paris Rundlet, CO Reg. No. 27474
5 Senior Assistant Solicitor General
6 Elizabeth Orem, CO Reg. No. 58309
7 Assistant Attorney General
8 Colorado Department of Law
9 Ralph L. Carr Judicial Center
10 Consumer Protection Section
11 1300 Broadway, 7th Floor
12 Denver, CO 80203
13 Phone: (720) 508-6651
14 bianca.miyata@coag.gov

15 *Attorneys for Plaintiff State of Colorado, ex rel.*
16 *Philip J. Weiser, Attorney General*

17 **ROB BONTA**
18 Attorney General
19 State of California

20 /s/ Megan O'Neill
21 Nicklas A. Akers (CA SBN 211222)
22 Senior Assistant Attorney General
23 Bernard Eskandari (SBN 244395)
24 Emily Kalanithi (SBN 256972)
25 Supervising Deputy Attorneys General
26 Nayha Arora (CA SBN 350467)
27 Megan O'Neill (CA SBN 343535)
28 Joshua Olszewski-Jubelirer (CA SBN 336428)
29 Marissa Roy (CA SBN 318773)
30 Brendan Ruddy (CA SBN 297896)
31 Deputy Attorneys General
32 California Department of Justice
33 Office of the Attorney General
34 455 Golden Gate Ave., Suite 11000
35 San Francisco, CA 94102-7004
36 Phone: (415) 510-4400
37 Fax: (415) 703-5480
38 Megan.ONeill@doj.ca.gov

39 *Attorneys for Plaintiff the People of the State of*
40 *California*

RUSSELL COLEMAN
Attorney General
Commonwealth of Kentucky

/s/ Daniel I. Keiser
J. Christian Lewis (KY Bar No. 87109),
Pro hac vice
Philip Heleringer (KY Bar No. 96748),
Pro hac vice
Zachary Richards (KY Bar No. 99209),
Pro hac vice
Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice
Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGHER@KY.GOV
Phone: (502) 696-5300
Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

MATTHEW J. PLATKIN
Attorney General
State of New Jersey
/s/ Thomas Huynh
Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice
Section Chief, Deputy Attorney General
Thomas Huynh (NJ Bar No. 200942017),
Pro hac vice
Assistant Section Chief, Deputy Attorney General
Verna J. Pradaxay (NJ Bar No. 335822021),
Pro hac vice
Mandy K. Wang (NJ Bar No. 373452021),
Pro hac vice
Deputy Attorneys General
New Jersey Office of the Attorney General,
Division of Law
124 Halsey Street, 5th Floor

1 Newark, NJ 07101
2 Tel: (973) 648-2052
3 Kashif.Chand@law.njoag.gov
4 Thomas.Huynh@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

5 *Attorneys for Plaintiff New Jersey*
6 *Division of Consumer Affairs*

7 **COVINGTON & BURLING LLP**

8 /s/ Ashley Simonsen
9 Ashley M. Simonsen, SBN 275203
10 COVINGTON & BURLING LLP
11 1999 Avenue of the Stars
12 Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

13 Phyllis A. Jones, pro hac vice
14 Paul W. Schmidt, pro hac vice
15 COVINGTON & BURLING LLP
16 One City Center
17 850 Tenth Street, NW
Washington, DC 20001-4956
18 Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

19 *Attorney for Defendants Meta Platforms, Inc.*
20 *f/k/a Facebook, Inc.; Facebook Holdings, LLC;*
Facebook Operations, LLC; Facebook
21 *Payments, Inc.; Facebook Technologies, LLC;*
Instagram, LLC; Siculus, Inc.; and Mark Elliot
22 *Zuckerberg*

SIGNATURE CERTIFICATION

Pursuant to Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: November 20, 2024

/s/ Ashley Simonsen

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

IT IS SO ORDERED.

DATED this 20th day of November, 2024.

Yvonne Gonzalez Rogers
YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE